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October 29, 2021

VIA ELECTRONIC FILING

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Apocalypse Bella
21 CR 247**

Dear Judge Engelmayer:

Counsel for Apocalypse Bella respectfully submits this letter seeking to modify a portion of our client's current release conditions.

Mr. Bella is seeking permission to leave home daily to take his children to and from school. He would travel Monday to Friday leaving at 7:45 a.m. from his home in Clackamas Oregon to Bilquist Elementary School, 15708 SE Webster Rd, Portland, Oregon, 97267 and return home at 9:15 am. He would leave home again to pick up the children at 2:45 p.m. and return at 4:15 p.m.

It is my understanding that Pretrial Services, through Officer Alexander Ian, has no objection to this request. Additionally, the Government, through Assistant US Dina Mcleod, has no objections to this request.

Mr. Bella has been in complete compliance with the terms of her pretrial release.

Thank you for your time and attention in this matter.

Respectfully Submitted,

/s/ Charles Kaser

Charles Kaser, Esq.
Attorney for the Defendant

GRANTED. The Clerk of Court is requested to terminate the motion at Dkt. No. 70.

10/29/2021

SO ORDERED.

A handwritten signature in blue ink that reads 'Paul A. Engelmayer'. Below the signature is a horizontal line, followed by the printed name 'PAUL A. ENGELMAYER' and the title 'United States District Judge'.

PAUL A. ENGELMAYER
United States District Judge